



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

September 6, 2011

John Allen, Forest Supervisor
c/o Shane Jeffries, District Ranger
1230 N.E. 3rd St., Suite A-262
Bend, Oregon 97701

RE: Ogden Landscape Vegetation Management Project (EPA Project Number 10-004-AFS)

Dear Mr. Allen:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Ogden Landscape Vegetation Management Project on the Bend/Ft. Rock Ranger District of Deschutes National Forest in Deschutes County, Oregon. Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

The DEIS analyzes the Forest Service's proposal to implement treatments that would move the proposed project area towards a more resilient condition and provide a diversity of habitats closer to what historically occurred. Proposed treatments would reduce forest density and fuels in order to promote and sustain late and old structured forest stands, and increase resilience to insects, disease, and stand-replacing wildfire. The project units would be located within a 26,521-acre project area. The DEIS analyzes a no action alternative and two action alternatives. Approximately 14,182 acres would be treated under Alternative 2 (Proposed Action) and approximately 14,422 acres would be treated under Alternative 3. Alternative 3 is identified as the preferred alternative.

The EPA is supportive of the overarching goals and objectives of the proposed project, and we find the DEIS to be clear, well organized, and robust. We appreciate the visual representations provided in conjunction with the descriptions of existing and projected stand conditions (i.e. Figures 14-26). This is a useful synthesis for the reader. We also appreciate the level of analysis given to activities proposed within the Riparian Habitat Conservation Areas (RHCAs). The photographs and site specific discussion and prescriptions help to provide clarity about the need for treatment and desired post treatment conditions. We are also pleased by the Forest's responsiveness to issues raised during the scoping process through the development and adoption of Alternative 3 as the preferred alternative. We support the approach in Alternative 3 of maintaining stands at or above the lower management zone, and the lighter touch within the RHCA. We are also cognizant, however, of recent research demonstrating that intensive thinning treatments are the most effective in reducing the probability of crown fires in the dry forests¹. The DEIS demonstrates that Alternative 3 would increase the percent of the landscape with low

¹ Johnson, Morris C.; Kennedy, Maureen C; Peterson, David L. 2011. Simulating fuel treatment effects in dry forests of the western United States: testing the principles of a fire-safe forest. Canadian Journal of Forest Research. 41(6): 1018-1030. <http://www.treearch.fs.fed.us/pubs/38390>

flame length potential (p. 149) and reduce crown fire potential (p. 154) but we encourage the Forest to consider this recent research as the final selected alternative is analyzed.

Based on our review, we are rating the DEIS as LO (Lack of Objections). We appreciate the opportunity to review and comment on the DEIS, and we look forward to furthering our understanding of this and other projects as we continue to participate on the Provincial Advisory Committee. If you have any questions about our review, please contact me at (206) 553-1601, or by electronic mail at reichgott.christine@epa.gov. Or you may contact Teresa Kubo of my staff at 503-326-2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.